

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

CAREN PAOLI,

Plaintiff,

ILLINICARE HEALTH PLAN, INC.,

Involuntary Plaintiff,

v.

SPEEDWAY LLC, and
ABC INSURANCE COMPANY,

Defendants.

Case No. 18-cv-897

Removed From:
Rock County Circuit Court
State of Wisconsin
Case No. 18-CV-0979

**DEFENDANT SPEEDWAY LLC'S
EXPERT WITNESS DISCLOSURE**

Now comes the defendant, Speedway LLC, by its attorneys, Kasdorf, Lewis & Swietlik, S.C., and as and for its expert witness disclosure and its F.R.C.P. 26(a)(2)(A) submission regarding defense experts to be called at trial, now states as follows:

1. Steven I. Grindel, M.D.
Associate Professor of Orthopedic Surgery
Director, Orthopedic Hand and Upper Extremity Center
Medical College of Wisconsin
Department of Orthopedic Surgery
9200 West Wisconsin Avenue
Milwaukee, WI 53226

Dr. Grindel performed an independent medical examination of plaintiff and also reviewed plaintiff's medical records and discovery in this case. He is expected to testify, consistent with a January 14, 2020 report prepared by him following his independent medical examination, that while plaintiff's claimed medical treatment has been reasonable and appropriate, it is unrelated to

the February 24, 2017 incident in question. A copy of his January 14, 2020 report is being provided to the parties with this disclosure as well as his rate sheet identifying the compensation to be paid for his services in this case. Additionally, a listing of other cases in which, during the previous four years he has testified as an expert at trial or by deposition, is being provided to the parties with this disclosure.

2. Defendant expressly reserves the right to call at trial, to question and cross-examine any and all other expert witnesses as identified and disclosed by the parties to this lawsuit.

3. Defendant expressly reserves the right to call rebuttal expert witnesses to the extent necessary based upon testimony of plaintiff's expert witnesses.

Dated this 31st day of January, 2020.

Electronically signed by Jason P. Gehring

Jason P. Gehring

State Bar No. 1061084

Kasdorf, Lewis & Swietlik, S.C.

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